

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

VICTORIA O'CONNOR,	)	
	)	
Plaintiff,	)	Case No.: 4:21-cv-01097
	)	
v.	)	Removed from Circuit Court of
	)	St. Charles County, Missouri
TARGET CORPORATION,	)	
	)	<b>JURY TRIAL REQUESTED</b>
Defendant.	)	

NOTICE OF REMOVAL

COMES NOW Defendant, TARGET CORPORATION, by and through its attorneys, BETH C. BOGGS and BOGGS, AVELLINO, LACH & BOGGS, L.L.C., pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1446, and for its Notice of Removal, states to the Court as follows:

1. This action entitled Victoria O'Connor v. Target Corporation was commenced in the Circuit Court of St. Charles County, State of Missouri, on or about July 2, 2021.
2. The attached Petition was served upon Target Corporation on or about August 4, 2021.
3. Upon information and belief, Defendant states that Plaintiff is a resident of the State of Missouri, as pled in Plaintiff's Petition, Paragraph 1.
4. Defendant, Target Corporation, is incorporated in the State of Minnesota and has its principal place of business in the State of Minnesota. Thus, for purposes of diversity, Defendant is a resident and citizen of the State of Minnesota.
5. Defendant asserts that complete diversity exists, as Defendant is a citizen of the State of Minnesota and has its principal place of business in the State of Minnesota. See

28 U.S.C. § 1332(c)(1).

6. This is an action over which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332, in that the matter in controversy, exclusive of interest and costs, exceeds the sum of \$75,000.00 and is between citizens of different states. The Plaintiff claims a traumatic brain injury from this event. See Plaintiff's Petition, Paragraph 13.

7. Counsel for the Defendant has reached out to Plaintiff's counsel to determine whether Plaintiff is seeking damages in excess of \$75,000.00. Counsel for the Plaintiff has confirmed via e-mail dated September 2, 2021, that Plaintiff is seeking damages in excess of \$75,000.00.

8. A copy of all processes, pleadings, orders, records, and proceedings filed in St. Charles County are attached to this Notice of Removal.

9. Defendant has filed this Notice of Removal within 30 days after the service of the Petition from which it was first ascertained that this case was removable.

WHEREFORE, Defendant, TARGET CORPORATION, respectfully requests that this Court acknowledge jurisdiction over this action and allow removal thereto to this Court for determination of all issues involved herein.

**DEFENDANT DEMANDS TRIAL BY JURY**

Respectfully submitted,

TARGET CORPORATION

By: /s/ Beth C. Boggs

Beth C. Boggs, #43089MO  
BOGGS, AVELLINO, LACH & BOGGS, L.L.C.  
9326 Olive Blvd., Suite 200  
St. Louis, MO 63132  
(314) 726-2310 Telephone  
(314) 726-2360 Facsimile  
bboggs@balblawyers.com  
**Attorneys for Defendant**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically filed with the Clerk of the United States District Court, Eastern District of Missouri, by using the Court's CM/ECF Electronic Filing System this 3<sup>rd</sup> day of September, 2021, with an electronic copy to be served by e-mail upon the following:

Andrew H. Marty, #37158  
Evan M. Bettag, #60932  
CHASSANIOL & MARTY, LLC  
5301 Veterens Memorial Parkway, Suite 201  
St. Peters, MO 63376  
(636) 486-4861 Telephone  
(636) 922-0994 Facsimile  
andy@trialstl.com  
evan@trialstl.com  
**Attorneys for Plaintiff**

Patricia A. Gorka

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

VICTORIA O'CONNOR,	)	
	)	
Plaintiff,	)	Case No.: 4:21-cv-01097
	)	
v.	)	Removed from Circuit Court of
	)	St. Charles County, Missouri
TARGET CORPORATION,	)	
	)	JURY TRIAL REQUESTED
Defendant.	)	

ORIGINAL FILING FORM

THIS CASE MUST BE COMPLETED AND VERIFIED BY THE FILING PARTY WHEN INITIATING A NEW CASE.

☐ THIS CAUSE, OR A SUBSTANTIALLY EQUIVALENT COMPLAINT, WAS PREVIOUSLY FILED IN THIS COURT AS CASE NUMBER \_\_\_\_\_ AND ASSIGNED TO THE HONORABLE JUDGE \_\_\_\_\_.

☒ NEITHER THIS CAUSE, NOR A SUBSTANTIALLY EQUIVALENT COMPLAINT, PREVIOUSLY HAS BEEN FILED IN THIS COURT, AND THEREFORE MAY BE OPENED AS AN ORIGINAL PROCEEDING.

The undersigned affirms that the information provided above is true and correct.

Date: September 3, 2021

/s/ Beth C. Boggs  
Signature of Filing Party

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

VICTORIA O'CONNOR

(b) County of Residence of First Listed Plaintiff St. Charles County, MO  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Andrew H. Marty, Evan M. Bettag, Chassaniol & Marty, LLC,  
5301 Veterans Memorial Pkwy, Ste 201, St. Peters, MO 63376,  
(636) 486-4861

## DEFENDANTS

TARGET CORPORATION

County of Residence of First Listed Defendant State of Minnesota  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Beth C. Boggs, Boggs, Avellino, Lach & Boggs, L.L.C.,  
9326 Olive Blvd., Suite 200, St. Louis, MO 63132, (314) 726-2310

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 U.S.C. §1332(c)(1)  
Brief description of cause:  
Alleged injury on premises of Defendant.

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 50,000.00 CHECK YES only if demanded in complaint:  
JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

09/03/2021

/s/ Beth C. Boggs

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

IN THE ELEVENTH JUDICIAL CIRCUIT, STATE OF MISSOURI  
CIRCUIT JUDGE DIVISION

VICTORIA O'CONNOR,	)	
Plaintiff,	)	Cause No.:
	)	
v.	)	Division:
	)	
TARGET CORPORATION,	)	<b>JURY TRIAL DEMANDED</b>
Defendant.	)	
Serve at:	)	
CT Corporation System	)	
120 South Central Avenue	)	
Clayton, MO 63105	)	

**PETITION FOR DAMAGES**

COMES NOW Plaintiff, Victoria O'Connor, by and through undersigned counsel, and for her Petition for Damages states as follows:

**PARTIES**

1. Plaintiff Victoria O'Connor is, and at all relevant times was, a resident of St. Charles County, Missouri.
2. Defendant Target Corporation (hereinafter "Target") is a Minnesota corporation registered with the Missouri Secretary of State to conduct business in this state.

**JURISDICTION AND VENUE**

3. This Court has jurisdiction pursuant to RSMo. §506.500.
4. Venue is proper in this Court pursuant to RSMo. §508.0101, in that Plaintiff was first injured in St. Charles County, Missouri.

**ALLEGATIONS COMMON TO ALL COUNTS**

5. At all times mentioned herein, Defendant Target owned, leased, operated, managed, maintained, and/or controlled the premises and property known as Target located at 3881 Mexico Road, St. Charles, Missouri (hereinafter "the Premises").

6. On September 7, 2019, Plaintiff was an invitee of Defendant Target at the Premises.
7. At that time and place, Plaintiff was moving a piece of carpeting on an overhead shelf.
8. At that time and place, a portion of the metal shelving detached and struck Plaintiff in the head.

**COUNT I – PREMISES LIABILITY**

9. Plaintiff incorporates and realleges Paragraphs 1 through 8 as if fully restated herein.
10. The shelving unit was assembled in such a manner such that parts could detach and fall and as such the store was not reasonably safe.
11. Defendant Target knew or by using ordinary care could have known of this condition.
12. Defendant Target failed to use ordinary care to remove, barricade, or warn of this condition.
13. As a direct and proximate result of such failure, Plaintiff suffered painful, disabling, and permanent injuries to her head, face, and brain.
14. As a direct and proximate result of the injuries described above, Plaintiff sustained suffering and pain, and her ability to enjoy life is diminished and impaired, all of which will continue into the future.
15. As a direct and proximate result of the injuries described above, Plaintiff has incurred medical expenses to cure or relieve the effects of her injuries.
16. As a direct and proximate result of the injuries described above, Plaintiff will incur future medical expenses to cure or relieve the effects of her injuries.
17. As a direct and proximate result of the injuries described above, Plaintiff has lost, and will lose in the future, income and wages.

WHEREFORE, Plaintiff Victoria O'Connor prays for judgement against Defendant Target Corporation for a sum in excess of Twenty-Five Thousand Dollars (\$25,000.00) that will fairly and justly compensate her for her damages, pre-judgment interest, costs incurred, and for such other and further relief as this Court deems just and proper.

**COUNT II – NEGLIGENCE - RES IPSA LOQUITUR**

18. Plaintiff incorporates and realleges Paragraphs 1 through 8 as if fully restated herein.
19. Defendant Target had control and management of the shelving unit that struck Plaintiff.
20. Metal shelving does not become detached when those in control exercise due care.
21. From the facts of such occurrence and the reasonable inferences therefrom, such occurrence was directly caused by Defendant Target's negligence.
22. As a direct and proximate result of such negligence, Plaintiff suffered painful, disabling, and permanent injuries to her head, face, and brain.
23. As a direct and proximate result of the injuries described above, Plaintiff sustained suffering and pain, and her ability to enjoy life is diminished and impaired, all of which will continue into the future.
24. As a direct and proximate result of the injuries described above, Plaintiff has incurred medical expenses to cure or relieve the effects of her injuries.
25. As a direct and proximate result of the injuries described above, Plaintiff will incur future medical expenses to cure or relieve the effects of her injuries.
26. As a direct and proximate result of the injuries described above, Plaintiff has lost, and will lose in the future, income and wages.

WHEREFORE, Plaintiff Victoria O'Connor prays for judgement against Defendant Target Corporation for a sum in excess of Twenty-Five Thousand Dollars (\$25,000.00) that will



fairly and justly compensate her for her damages, pre-judgment interest, costs incurred, and for such other and further relief as this Court deems just and proper.

Respectfully Submitted,

CHASSANIOL & MARTY, LLC

/s/ Andrew H. Marty

Andrew H. Marty, #37158

Evan M. Bettag, #60932

5301 Veterans Memorial Pkwy, Suite 201

St. Peters, MO 63376

(636) 486-4861

(636) 922-0994 facsimile

andy@trialstl.com

evan@trialstl.com

*Attorneys for Plaintiff*



## IN THE 11TH JUDICIAL CIRCUIT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: MICHAEL JAMES FAGRAS	Case Number: 2111-CC00564
Plaintiff/Petitioner: VICTORIA O'CONNOR	Plaintiff's/Petitioner's Attorney/Address EVAN MICHAEL BETTAG CHASSANIOL & MARTY LLC 5301 VETERANS MEMORIAL PKWY SUITE 201 SAINT PETERS, MO 63376
Defendant/Respondent: TARGET CORPORATION	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

**Summons in Civil Case**

The State of Missouri to: **TARGET CORPORATION**  
Alias:

1000 NICOLLET MALL  
MINNEAPOLIS, MN 55403

Serve at:  
CT Corporation System  
120 South Central Avenue  
Clayton, MO 63105

**COURT SEAL OF**  
  
**ST. CHARLES COUNTY**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

7/6/2021 Date /S/ Cheryl Crowder Clerk

Further Information:

**Sheriff's or Server's Return****Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).
- ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

**Sheriff's Fees, if applicable**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$. \_\_\_\_\_ per mile)

**Total** \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 11TH JUDICIAL CIRCUIT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: MICHAEL JAMES FAGRAS	Case Number: 2111-CC00564
Plaintiff/Petitioner: VICTORIA O'CONNOR	Plaintiff's/Petitioner's Attorney/Address EVAN MICHAEL BETTAG CHASSANIOL & MARTY LLC 5301 VETERANS MEMORIAL PKWY SUITE 201 SAINT PETERS, MO 63376
Defendant/Respondent: TARGET CORPORATION	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: TARGET CORPORATION

Alias:

1000 NICOLLET MALL  
MINNEAPOLIS, MN 55403Serve at:  
CT Corporation System  
120 South Central Avenue  
Clayton, MO 63105

COURT SEAL OF



ST. CHARLES COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

7/6/2021  
Date/s/ Cheryl Crowder  
Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☒ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to:  
Bonnie Love (name) authorized to accept process (title).
- ☐ other: \_\_\_\_\_

Served at 120 S Central, #400, St. Louis, MO 63105 (address)in St. Louis County (County/City of St. Louis), MO, on 8-4-21 (date) at 12:47pm (time).John Fredericks

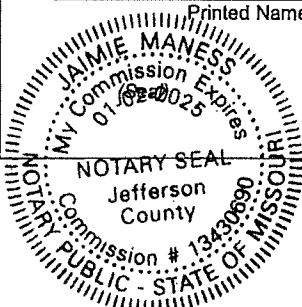
Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 8/5/2021 (date).My commission expires: 12/2025 Date

Notary Public



**Sheriff's Fees, if applicable**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

**Total** \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.